

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JANE ROE ET AL.,)	Case No. 1:22-cv-00376-MWM
)	
Plaintiffs,)	Judge Matthew W. McFarland
)	
v.)	
)	
UNIVERSITY OF CINCINNATI,)	
)	
Defendant.)	
)	

**DEFENDANT UNIVERSITY OF CINCINNATI'S RESPONSE TO PLAINTIFFS'
MOTION FOR LEAVE TO PROCEED ANONYMOUSLY**

Defendant University of Cincinnati (“UC”) does not oppose Plaintiffs’ Motion for Leave to Proceed Anonymously (Doc. 2). In addition to protecting the anonymity of Plaintiffs, however, UC also believes that pseudonyms should be substituted for the initials of the non-party students identified in Plaintiffs’ Complaint (Doc. 1). The parties have conferred about this issue. Plaintiffs do not believe the use of initials was improper, but also do not oppose what UC proposes to protect the anonymity of non-party students. As a result of discussions, the parties have agreed in principle to a proposed plan to preserve the anonymity of Plaintiffs and any other student witnesses, subject to the Court’s approval. Subject to the Court’s approval, on or before Friday, August 26, 2022, UC will submit to the Court a proposed Order and related Motion that UC anticipates will be unopposed by Plaintiffs and is intended to protect the anonymity of Plaintiffs and other UC students referenced in Plaintiffs’ Complaint.

Respectfully submitted,

DAVE YOST
ATTORNEY GENERAL OF OHIO

/s/ Michael H. Carpenter

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was filed electronically on August 22, 2022. Notice was sent by operation of the Court's electronic filing system to all other counsel who have entered an appearance and any parties who have entered an appearance through counsel. The parties may access this filing through the Court's ECF system.

/s/ Michael H. Carpenter
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*Trial Attorney for Defendant University of
Cincinnati*